

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

No. 17-cr-20274

Plaintiff,

Honorable Bernard A. Friedman

v.

JUMANA NAGARWALA,
FAKHRUDDIN ATTAR, and
FARIDA ATTAR.

Defendants.

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE A
REPLY BRIEF IN EXCESS OF SEVEN PAGES**

Jumana Nagarwala, M.D., through her attorney Shannon Smith; Fakhruddin Attar, M.D., through his attorney Mary Chartier; and Farida Attar, Ph.D., through her attorney Matthew R. Newburg; respectfully request permission to file a reply brief in support of the Reply to government's Response to Defendants' Motion to Suppress Wiretaps and All Evidence Obtained as a Result of Those Wiretaps. Local Rule 7.1(d)(3)(A) states that briefs may not exceed 7 pages.

The reasons for additional pages are as follows: (1) to thoroughly explain the history of this highly complicated case; (2) the issue requires

analysis regarding the lack of probable cause in a lengthy, 84-page Affidavit; and, (3) instead of filing multiple motions, D-1 through D-3 have consolidated their arguments and the instant Reply regarding this issue.

Pursuant to Local Court Rule 7.1(a)(1), Counsel have sought concurrence from the government, and the government **does concur** to allow the above-captioned Defendants to have the additional requested pages.

WHEREFORE, Defendants respectfully requests the entry of an order granting this motion for leave to file a brief in excess of the page limit.

Respectfully submitted,

5/25/2021
Date

/s/SHANNON SMITH
Shannon Smith
Attorney for Jumana Nagarwala, M.D.

5/25/2021
Date

/s/MARY CHARTIER
Mary Chartier
Attorney for Fakhruddin Attar, M.D.

5/25/2021
Date

/s/MATTHEW R. NEWBURG
Matthew R. Newburg
Attorney for Farida Attar, Ph.D.

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2021, I e-filed and electronically served the foregoing document to all counsel of record.

/s/Shannon Smith
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